



155 N 400 W Suite 100
Salt Lake City, Utah 84103

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

1. Date filed: 2/27/2012
2. Name of company(s) covered by this certification: Smart LD, LLC
3. Form 499 Filer ID: 827899
4. Name of signatory: Steve Hardy
5. Title of signatory: CEO
6. Certification:

Attn: Commissions Secretary, Marlene H. Dortch

I, Steve Hardy, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.


See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 
Steve Hardy, CEO
Smart LD

Attachments: Accompanying Statement explaining CPNI procedures

No. of Copies rec'd 0+3
List ABCDE



Form 488 Filer ID: 825368
EB Docket No. 06-36

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CPNI Procedures

Smart LD, LLC is a wholesale company that does not participate in any marketing campaigns. This makes it simple for Smart LD not to divulge any CPNI accidentally to non-authorized employees. Also, Smart LD's billing system date stamps the user IDs of all who enter and change billing information. Smart LD's network firewall is up to date and protected by a system called NetScreen. Smart LD also outsources with a third party, TechServ, Inc., to keep Smart LD's IT systems stable and secure from outside access.